

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

ARC CONTROLS, INC.

VERSUS

CASE NO. 1:19-cv-00391-LG-RPM

M/V NOR GOLIATH, *In Rem*, and  
GOLIATH OFFSHORE HOLDINGS  
PTE.LTD, *In Personam*

*Consolidated with:*  
Case No. 1:19-cv-00395-LG-RPM

**RESPONSE IN OPPOSITION TO GOLIATH'S  
MOTION TO REDUCE COUNTER-SURETY BOND**

NOW COME Plaintiffs-in-Intervention, Central Boat Rentals, Inc. ("Central Boat"), Curtin Maritime Corporation ("Curtin Maritime"), Offshore Towing, Inc. ("Offshore Towing"), Global Towing Service, LLC ("Global Towing"), and McAllister Towing of New York, LLC ("McAllister") (sometimes collectively "Towing Companies") and respectfully submit this Response in Opposition to Goliath's Motion to Reduce Counter-Surety Bond. (R. Doc. 512). For the reasons discussed in the accompanying Memorandum in Opposition, Goliath's motion should be denied to the extent that it does not account for the value of the claims asserted by the Towing Companies while the dismissal of their claims is being appealed.

WHEREFORE the Towing Companies pray that Goliath's motion be denied, in part, and that the Court require that any reduced counter-surety bond include the value of the Towing Companies claims on appeal.

Respectfully submitted:

**s/André J. Mouledoux**

GERARD J. DRAGNA (MS Bar #104083)

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*Offshore Towing, Inc., Global Towing Service,*

*LLC, McAllister Towing of New York, LLC, and*

*MARMAC, LLC*

Response Opposition to Goliath Mtn Reduce Counter Security Bond

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2021, I electronically filed the foregoing with the Clerk of Court by using CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

**s/André J. Mouledoux**